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October 17, 2019

VIA ELECTRONIC MAIL

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Re: *Overton, et al. vs. Mattel, Inc. and Fisher-Price, Inc.*

Dear Counsel:

On behalf of Mattel, Inc. ("Mattel"), we write to advise you that Mattel will today provide its 1st document production in response to discovery requests served in the above-referenced matter ("Matter") via secure file transfer from our vendor. You will receive a password to access the download in a separate email.

Pursuant to the parties' agreement, Mattel's 1st document production for its initial Rule 26(a)(1) disclosure consists of the following documents based on the Goodrich and Torres cases' production, along with some additional documents specific to the Overton matter:

	Starting Bates	Ending Bates
Documents based on production produced in the Goodrich Matter and the Torres matter	Mattel-OV0000001	Mattel-OV0007541
Additional Corporate Documents for Overton matter.	Mattel-OV007542	Mattel-OV0007644

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Pursuant to the parties' agreement, these documents are produced subject to the Protective Order entered by the Court in the Goodrich matter until such time as a protective order is entered in this Matter, and are subject to all the rights and limitations imposed by the terms of that order. We remind Plaintiffs that the enclosed documents and data are not to be disclosed in any fashion, nor be used for any purpose other than the analysis and preparation for trial of this action, and shall not be otherwise disclosed or made available. As noted above, documents bearing bates-labels Mattel-OV0000001 through Mattel-OV0007644 were produced in the Goodrich Matter and the Torres Matter and are therefore marked with confidentiality designations applied in those matters. Mattel is reviewing the confidentiality designations of those documents and will, to the extent necessary, de-designate documents that are not confidential pursuant to the protective order ultimately entered in this matter.

In addition, please note that Mattel's productions are made pursuant to federal and Virginia discovery rules and are not, and should not be considered, in any manner whatsoever, a waiver of Mattel's rights, privileges or defenses, including their rights under applicable law to object to the relevance or admissibility of the documents or information contained therein as evidence at any future hearing or trial of this matter. Further, production of these documents is not, and should not be considered in any manner whatsoever, a waiver of any privilege available to Mattel under applicable law, and Mattel hereby expressly reserves and preserves every privilege available.

To the extent the produced documents contain communications or material protected by the attorney-client privilege or HIPAA, or contain personally protected information (PPI) or other product information, such information has been redacted. We have made every effort to find and redact any such material, but it remains possible that some privileged, HIPAA or PPI material was produced inadvertently. Should you identify any protected information that should have been redacted, please notify us at your earliest possible convenience.

Please let us know if you have any issues accessing the production.

Cordially,

A handwritten signature in blue ink, appearing to read "Stephen T. Fowler".

Stephen T. Fowler

cc: Lori G. Cohen, Esq.

ADMIN 36016546v1



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November 6, 2019

VIA ELECTRONIC MAIL

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Re: *Overton, et al. vs. Mattel, Inc. and Fisher-Price, Inc.*

Dear Counsel:

On behalf of Mattel, Inc. and Fisher-Price, Inc. ("Defendants"), we write to advise you that Defendants will today provide their 2nd document production in response to discovery requests served in the above-referenced matter ("Matter") via secure file transfer. You will receive a password to access the download in a separate email.

Defendants' 2nd document production consists of the following additional documents based on the Goodrich and Torres cases' production, along with some additional documents specific to the Overton matter:

	Starting Bates	Ending Bates
Additional documents based on production produced in the Goodrich Matter and the Torres matters and additional responsive documents to RFP	Mattel-OV0007645	Mattel-OV00012513

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Pursuant to the parties' agreement, these documents are produced subject to the Protective Order entered by the Court in the Goodrich matter until such time as a protective order is entered in this Matter, and are subject to all the rights and limitations imposed by the terms of that order. We remind Plaintiffs that the enclosed documents and data are not to be disclosed in any fashion, nor be used for any purpose other than the analysis and preparation for trial of this action, and shall not be otherwise disclosed or made available. As noted above, documents produced in the Goodrich Matter and the Torres Matter are marked with confidentiality designations applied in those matters. Defendants are reviewing the confidentiality designations of those documents and will, to the extent necessary, de-designate documents that are not confidential pursuant to the protective order ultimately entered in this matter.

In addition, please note that Defendants' productions are made pursuant to federal and Virginia discovery rules and are not, and should not be considered, in any manner whatsoever, a waiver of Defendants' rights, privileges or defenses, including their rights under applicable law to object to the relevance or admissibility of the documents or information contained therein as evidence at any future hearing or trial of this matter. Further, production of these documents is not, and should not be considered in any manner whatsoever, a waiver of any privilege available to Defendants under applicable law, and Defendants hereby expressly reserves and preserves every privilege available.

To the extent the produced documents contain communications or material protected by the attorney-client privilege or HIPAA, or contain personally protected information (PPI) or other product information, such information has been redacted. We have made every effort to find and redact any such material, but it remains possible that some privileged, HIPAA or PPI material was produced inadvertently. Should you identify any protected information that should have been redacted, please notify us at your earliest possible convenience.

Please let us know if you have any issues accessing the production.

Cordially,

A handwritten signature in blue ink, appearing to read "Stephen T. Fowler".

Stephen T. Fowler

cc: Lori G. Cohen, Esq.

ADMIN 36056495v1